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4 March 2024

Hon. Lewis J. Liman
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States District Courthouse
500 Pearl Street
New York, NY 10007

Re: *Rolling Stone, LLC v. DOJ*, Case No. 23-10741

Dear Judge Liman:

On behalf of Plaintiff Rolling Stone, LLC, I respectfully submit this letter motion to modify the briefing schedule currently established for the motion for partial summary judgment currently due on 5 March 2024. Defendant consents to this Motion.

I have good cause to file this Motion. The parties have been engaged in settlement negotiations regarding the processing of Plaintiff's FOIA request, and I am filing this Motion to allow the parties to continue these discussions. We are proposing a lengthier-than-usual extension period due to existing conflicts in the respective schedules of the parties' counsel.

After coordinating with Defendant's counsel, I respectfully request that the Court enter the following schedule for Plaintiff's forthcoming motion for partial summary judgment.

9 April – Plaintiff's motion
17 May – Defendant's opposition
11 June – Plaintiff's reply

Sincerely,



Kel McClanahan
Counsel for Plaintiff Rolling Stone